

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re SHENGDATECH, INC. SECURITIES	:	Master No. 1:11-cv-01918-LGS
LITIGATION	:	
	:	<u>CLASS ACTION</u>
	:	
This Document Relates To:	:	LEAD COUNSEL’S NOTICE OF MOTION
	:	AND MOTION FOR AN AWARD OF
ALL ACTIONS.	:	ATTORNEYS’ FEES AND EXPENSES
	:	
	X	

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Counsel will hereby move this Court, on September 17, 2015, at 10:30 a.m., for entry of an order: (i) awarding attorneys' fees and expenses; and (ii) granting such other and further relief as the Court may deem just and proper. This Motion is based on: (i) a Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses; (ii) the Declaration of Mario Alba Jr. in Support of Motion for Final Approval of Class Action Settlement, Plan of Distribution of Settlement Proceeds, and an Award of Attorneys' Fees and Expenses, dated July 13, 2015; (iii) the Declaration of Mario Alba Jr. Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support of Application for Award of Attorneys' Fees and Expenses; (iv) the Declaration of Michael S. Etkin Filed on Behalf of Lowenstein Sandler LLP in Support of Application for Award of Attorneys' Fees and Expenses; (v) the Declaration of Carole K. Sylvester Re (A) Mailing of the Amended Notice of Pendency and Proposed Settlement of Class Action, the Amended Notice of Partial Class Action Settlement, and the Proof of Claim and Release Form, (B) Publication of the Summary Notice, (C) Internet Posting, and (D) Requests for Exclusion Received to Date, dated July 13, 2015; (vi) all of the prior pleadings and papers in this Action; and (vii) such additional information or argument as may be required by the Court.

A proposed order will be submitted with Lead Counsel's reply submission after the deadline for objections has passed.

DATED: July 13, 2015

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
MARIO ALBA JR.

/s/ Mario Alba Jr.
MARIO ALBA JR.

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
malba@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
JEFFREY D. LIGHT
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
619/231-1058
619/231-7423 (fax)
jeffl@rgrdlaw.com

Counsel for Lead Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 13, 2015.

s/ Mario Alba Jr.

MARIO ALBA JR.

ROBBINS GELLER RUDMAN
& DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

E-mail: malba@rgrdlaw.com

Mailing Information for a Case 1:11-cv-01918-LGS

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Mario Alba , Jr**
malba@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com,drosenfeld@rgrdlaw.com
- **Miriam G. Bahcall**
bahcallm@gtlaw.com
- **Michael Gerard Capeci**
mcapeci@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Stephen Mark Dollar**
sdollar@fulbright.com,rshavers@fulbright.com
- **Frederic Scott Fox , Sr**
ffox@kaplanfox.com
- **Donald R. Hall , Jr**
dhall@kaplanfox.com
- **Steven W. Hansen**
steven.hansen@morganlewis.com,david.marcus@morganlewis.com,nymanagingclerk@morganlewis.com
- **Robert Allen Horowitz**
horowitzr@gtlaw.com,schaefferc@gtlaw.com,GTcourtAlert@gtlaw.com
- **KPMG LLP**
bgreenblum@wc.com
- **Phillip C. Kim**
pkim@rosenlegal.com
- **Irina Kobylevsky**
ikobylevsky@kaplanfox.com
- **Edward Y. Kroub**
ekroub@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Jeremy Alan Lieberman**
jalieberman@pomlaw.com,disaacson@pomlaw.com,lpvega@pomlaw.com
- **Jeffrey David Light**
jeffl@rgrdlaw.com
- **Avital Orly Malina**
amalina@rgrdlaw.com
- **Hae Sung Nam**
hnam@kaplanfox.com

- **Mark Thomas Oakes**
moakes@fulbright.com
- **Samuel Howard Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Ari Micah Selman**
ari.selman@morganlewis.com,nymanagingclerk@morganlewis.com
- **Jeffrey Q. Smith**
jeffrey.smith@morganlewis.com,nymanagingclerk@morganlewis.com
- **Ceren Marie Unal**
cunal@fulbright.com,rshavers@fulbright.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)